



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TAW
F#:2015R02080

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 22, 2020

By ECF

The Honorable Carol B. Amon
United States District Judge
United States District Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Deovaldo Gutierrez Alfaro
Docket No. 16-CR-241 (S-2) (CBA)

Dear Judge Amon:

The government respectfully submits this letter to provide the Court with an update regarding the government's efforts to make protected discovery available to the defendant at the Metropolitan Detention Center ("MDC").

On October 21, 2020, the parties appeared before the Court for a status conference. At that conference, the government noted that it had provided the MDC with a copy of its discovery productions and requested that the protected discovery be made available to the defendant at the MDC's law library. As the Court is aware, the MDC responded that the drive the government initially provided was not one the MDC would accept.

After the status conference, the MDC clarified that the government can provide the discovery on either CDs or on a different type of drive. The government is currently preparing the discovery on both CDs and on the appropriate drive and will provide both to the MDC in the near future.

At the October 21, 2020 status conference, the Court also inquired as to whether the MDC would accept an mp3 player. Legal staff at the MDC stated to the government that the MDC would object to an mp3 player entering the MDC. Nonetheless,

both the government and the MDC are confident that the above-described CDs and new drive will be sufficient for the defendant to review the discovery.

Respectfully submitted,

SETH D. DuCHARME
Acting United States Attorney

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cc: Steve Zissou, Esq. (by ECF)